

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al., <i>Plaintiffs,</i>	
v.	5:21-cv-0844-XR
STATE OF TEXAS, et al., <i>Defendants.</i>	
OCA-GREATER HOUSTON, et al., <i>Plaintiffs,</i>	
v.	1:21-cv-0780-XR
TEXAS SECRETARY OF STATE JANE NELSON, et al., <i>Defendants.</i>	
HOUSTON AREA URBAN LEAGUE, et al., <i>Plaintiffs,</i>	
v.	5:21-cv-0848-XR
GREGORY WAYNE ABBOTT, et al., <i>Defendants.</i>	

**DECLARATION OF DESTINY LOPEZ IN SUPPORT OF EXHIBITS TO PLAINTIFFS’
RESPONSE AND MEMORANDUM IN OPPOSITION TO STATE DEFENDANTS’
MOTION FOR SUMMARY JUDGMENT AND PORTIONS OF DISTRICT ATTORNEY
OGG’S MOTION FOR SUMMARY JUDGMENT ON ADA AND REHABILITATION
ACT CLAIMS**

1. My name is Destiny Lopez, and I am over twenty-one years of age, of sound mind and fully competent to make this Declaration. I am an associate at Reed Smith LLP and am counsel of record, admitted pro hac vice, for Plaintiffs Houston Area Urban League, Delta Sigma Theta Society, Inc.; The Arc of Texas; and Jeffrey Lamar Clemmons. (“HAUL Plaintiffs”).

2. I have personal knowledge of the facts stated herein, and all are true and correct. I make this Declaration in support of Plaintiffs’ Response and Opposition to State Defendants’

Motion for Summary Judgment and Portions of District Attorney Ogg's Motion for Summary Judgment on ADA and Rehabilitation Act Claims, filed in the above-captioned case.

3. Attached hereto as **Exhibit 1** is a true and correct copy of an April 6, 2022 Houston Chronicle article titled: Nearly 25,000 mail ballots were rejected in Texas primaries, fueled by confusion over new restrictions.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Expert Report of Professor Douglas L. Kruse, Ph.D., dated February 28, 2022.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Declaration of Dr. Kara Ayers.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the Expert Report of Dr. Kara Ayers.

7. Attached here to as **Exhibit 5** is a true and correct copy of the testimony to the Senate Affairs Committee Against SB1, August 9, 2021 [TXLEG_0002408].

8. Attached hereto as **Exhibit 6** is a true and correct copy of *SB 1 Makes It Difficult for Texans with Disabilities to Vote, Hearing Before the Senate State Affairs Committee, 2nd Special Session (2021)* (written statement of Alex Cogan, Manager of Pub. Policy & Advocacy, The Arc of Tex.)

9. Attached hereto as **Exhibit 7** is a true and correct copy of the testimony of Patty Ducayet.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the testimony of Anne Robinson.

11. Attached hereto as **Exhibit 9** is a true and correct copy of Rep. Bucy comments from April 1, 2023 House Elections Committee Hearing.

12. Attached hereto as **Exhibit 10** is a true and correct copy of the Declaration of Terri Saltzman, dated May 2023.

13. Attached hereto as **Exhibit 11** is a true and correct copy of the Declaration of Yvonne Iglesias, dated May 12, 2023.

14. Attached hereto as **Exhibit 12** is a true and correct copy of the Dr. Kara Ayers Deposition Excerpts. May 10, 2022.

15. Attached hereto as **Exhibit 13** is a true and correct copy of the Supplemental Declaration of Anne Scott, dated June 18, 2023

16. Attached hereto as **Exhibit 14** is a true and correct copy of the Supplemental Declaration of Taylor Scott, dated June 18, 2023

17. Attached hereto as **Exhibit 15** is a true and correct copy of the Declaration of Jennifer Miller, dated June 20, 2023

18. Attached hereto as **Exhibit 16** is a true and correct copy of the Declaration of Amy Litzinger, dated June 21, 2023.

19. Attached hereto as **Exhibit 17** is a true and correct copy of the Declaration of Yolanda Ross, dated June 22, 2023.

20. Attached hereto as **Exhibit 18** is a true and correct copy of the Declaration of Heisha Freeman, dated June 22, 2023.

21. Attached hereto as **Exhibit 19** is a true and correct copy of the Declaration of Marc Spier, dated June 23, 2023.

22. Attached hereto as **Exhibit 20** is a true and correct copy of the Declaration of Jodi Lydia Nunez Landry, dated June 22, 2023.

23. Attached hereto as **Exhibit 21** is a true and correct copy of the Declaration of Laura Halvorson, dated May 24, 2023.

24. Attached hereto as **Exhibit 22** is a true and correct copy of the Declaration of Jennifer Martinez, dated June 20, 2023.

25. Attached hereto as **Exhibit 23** is a true and correct copy of the Supplemental Declaration of Bob Kafka, dated June 16, 2023.

26. Attached hereto as **Exhibit 24** is a true and correct copy of Help America Vote Act (HAVA) information page from Texas Secretary of State, dated January 2022.

27. Attached hereto as **Exhibit 25** is a true and correct copy of Help America Vote Act (HAVA) Update, Texas Association of Counties, Legislative Conference, dated August 27, 2020.

28. Attached hereto as **Exhibit 26** is a true and correct copy of Letter from Ruth R. Hughs, Texas Secretary of State, to Mona Harrington, Acting Exec. Dir., U.S. Election Assistance Commission, dated May 14, 2020.

29. Attached hereto as **Exhibit 27** is a true and correct copy of Bob Kafka's Deposition Excerpts, April 7, 2022.

30. Attached hereto as **Exhibit 28** is a true and correct copy of Toby Cole's Deposition Excerpts, June 28, 2022.

31. Attached hereto as **Exhibit 29** is a true and correct copy of Teri Saltzman's Deposition Excerpts, July 15, 2022.

32. Attached hereto as **Exhibit 30** is a true and correct copy of Alice Penrod's Deposition Excerpts, April 27, 2023.

33. Attached hereto as **Exhibit 31** is a true and correct copy of Nancy Crowther's Deposition Excerpts, June 17, 2022.

34. Attached hereto as **Exhibit 32** is a true and correct copy of Yvonne Iglesias' Deposition Excerpts, April 17, 2023.

35. Attached hereto as **Exhibit 33** is a true and correct copy of Dallas County 30(b)(6) Tacoma Phillips' Deposition Excerpts, April 13, 2023.

36. Attached hereto as **Exhibit 34** is a true and correct copy of Isabel Longoria's Deposition Excerpts, Afternoon April 20, 2022.

37. Attached hereto as **Exhibit 35** is a true and correct copy of Catherine Cranston's Deposition Excerpts, June 23, 2022.

38. Attached hereto as **Exhibit 36** is a true and correct copy of Jacquelyn Callanen's Deposition Excerpts, April 20, 2022.

39. Attached hereto as **Exhibit 37** is a true and correct copy of Rachelle Obakozuwa's Deposition Excerpts, March 21, 2023.

40. Attached hereto as **Exhibit 38** is a true and correct copy of the Expert Report of Daniel A. Smith, Ph.D., dated April 29, 2022.

41. Attached hereto as **Exhibit 39** is a true and correct copy of Dallas County 30(b)(6) Michael Scarpello's Deposition Excerpts, April 13, 2023.

42. Attached hereto as **Exhibit 40** is a true and correct copy of Jennifer Colvin's Deposition Excerpts, March 21, 2023.

43. Attached hereto as **Exhibit 41** is a true and correct copy of Brian Keith Ingram's Deposition Excerpts, May 6, 2022.

44. Attached hereto as **Exhibit 42** is a true and correct copy of Brian Keith Ingram's Deposition Excerpts, April 26, 2022.

45. Attached hereto as **Exhibit 43** is a true and correct copy of Lauren Smith's Deposition Excerpts, March 21, 2023.

46. Attached hereto as **Exhibit 44** is a true and correct copy of Dan Hayes' Deposition Excerpts, March 29, 2023.

47. Attached hereto as **Exhibit 45** is a true and correct copy of Michael Scarpello's Deposition Excerpts, May 4, 2022.

48. Attached hereto as **Exhibit 46** is a true and correct copy of Isabel Longoria's Deposition Excerpts, Morning April 20, 2022.

49. Attached hereto as **Exhibit 47** is a true and correct copy of Lisa Wise's Deposition Excerpts, April 13, 2022.

50. Attached hereto as **Exhibit 48** is a true and correct copy of Dallas County Elections Department webpage.

51. Attached hereto as **Exhibit 49** is a true and correct copy of Dally Counyt Elections Administrator's Office webpage.

52. Attached hereto as **Exhibit 50** is a true and correct copy of Bexar County Elections Department webpage.

53. Attached hereto as **Exhibit 51** is a true and correct copy of Travis County Voters with Disabilities webpage.

54. Attached hereto as **Exhibit 52** is a true and correct copy od El Paso County Voters with Special Needs webpage.

55. Attached hereto as **Exhibit 53** is a true and correct copy of Hidalgo County Voters with Special Needs webpag.

56. Attached hereto as **Exhibit 54** is a true and correct copy of the Expert Report of Daniel A. Smith, Ph.D., dated April 22, 2023.

57. Attached hereto as **Exhibit 55** is a true and correct copy of the Declaration of Nancy Crwother, dated June 21 2023.

58. Attached hereto as **Exhibit 56** is a true and correct copy of the Harris County Commissioners Court Video webpage.

59. Attached hereto as **Exhibit 57** is a true and correct copy of Harris County Sheriff's Office Victim Advocates Award 2019-V3-GX-0134.

60. Attached hereto as **Exhibit 58** is a true and correct copy of Grant Summary to Harris County webpage.

61. Attached hereto as **Exhibit 59** is a true and correct copy of excerpts from Juanita Valdez-Cox Deposition, dated March 4, 2022

62. Attached hereto as **Exhibit 60** is a true and correct copy of April 6, 2022 Houston Chronicle article titled: More than 12% of mail-in ballots were rejected in Texas under new GOP voting rules, final tally shows.

63. Attached hereto as **Exhibit 61** is a true and correct copy of Pamela Gaskin Deposition Excerpts, dated June 29, 2022.

64. Attached hereto as **Exhibit 62** is a true and correct copy of Alice Penrod Deposition Excerpts, dated

65. Attached hereto as **Exhibit 63** is a true and correct copy of Tania Chavez Deposition Excerpts, dated June 15, 2023.

66. Attached hereto as **Exhibit 64** is a true and correct copy of Brian Keith Ingram Deposition Excerpts, dated March 28, 2023.

67. Attached hereto as **Exhibit 65** is a true and correct copy of Taylor Scott Deposition Excerpts, dated April 18, 2023.

68. Attached hereto as Exhibit 66 is a true and correct copy of Sadia Tirmizi Deposition Excerpts, dated May 8, 2023.

Dated: June 23, 2023

A handwritten signature in black ink, appearing to read "Destiny R. Lopez", written in a cursive style.

Destiny R. Lopez*

*admitted pro hac vice